

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

Bundren Law Group, PLLC,

Case No. 4:24-cv-00900-SDJ

Plaintiff,

vs.

Atlantic Specialty Insurance Company;
One Beacon Professional Insurance Group;
One Beacon Professional Insurance, Inc.;
Intact Insurance Group, USA, LLC; Intact
Insurance Group USA Holdings, Inc.;
Intact Financial Corporation; TGP
Communications, LLC; James “Jim” Hoft,
individually; and Joe Hoft, individually,

Defendants.

**NOTICE OF JOINDER TO DEFENDANT’S
OPPOSITION TO PLAINTIFF’S SECOND MOTION TO REMAND**

Defendant Atlantic Specialty Insurance Company (“ASIC”) along with improperly named: Intact Financial Corporation, Intact Insurance Group USA Holdings Inc., Intact Insurance Group USA LLC, OneBeacon Professional Insurance, Inc., *a dissolved corporation*; and One Beacon Professional Insurance Group, *a fictitious entity* (collectively the “ASIC defendants”) hereby join, and incorporate by reference, the arguments and authorities contained in Defendants TGP Communications, LLC and James “Jim” Hoft and Joe Hoft’s (“Defendants”), Opposition to Plaintiff’s Second Motion to Remand, filed on November 22, 2024 (ECF No. 61). The motion to remand should be denied.

Respectfully submitted,

By: /s/ Nicholas J. O'Connell
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COMPANY; INTACT FINANCIAL
CORPORATION; INTACT INSURANCE
GROUP USA HOLDINGS INC.; INTACT
INSURANCE GROUP USA LLC;
ONEBEACON PROFESSIONAL
INSURANCE, INC., a *dissolved
corporation*; and ONE BEACON
PROFESSIONAL INSURANCE GROUP, a
*fictitious entity***